

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2021-93-E

Dominion Energy South Carolina,
Incorporated's Request for "Like
Facility" Determinations Pursuant to
S.C. Code Ann. § 58-33-110(1) and
Waiver of Certain Requirements of
Commission Order No. 2007-626

PETITION TO INTERVENE

The South Carolina Coastal Conservation League (“CCL”) and Southern Alliance for Clean Energy (“SACE”) (collectively, “Petitioners”) respectfully petition the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned docket pursuant to R.103-825 of the Commission’s rules of practice and procedure. In support of this petition, Petitioners state as follows:

1. On March 10, 2021, Dominion Energy South Carolina, Incorporated (“DESC”) filed an application with the Commission to replace existing peaking generation (the “Peaker Plan”), including ten combustion turbines and one steam turbine-generator, at its Bushy Park, Parr, and Urquhart sites. Following replacement of the units, the Company plans on retiring three other existing combustion turbines at the Hardeeville and Coit sites. In its application, DESC asks the Commission to 1) find pursuant to S.C. Code Section 58-33-110(1) (2015) that the replacement turbines at the Urquhart site are “like facilities” for the existing units and do not therefore constitute “construction of a major utility facility” for which certification is required under the Utility Facility Siting Act and Environmental Protection Act; 2) find that Order 2007-626, which requires

DESC to conduct a mandatory request for proposals (“RFP”) for “new peaking generation requirements,” does not apply to the replacement units because the new turbines are replacements and not new generation; and 3) if the Commission finds that Order 2007-626 does apply to the replacement units, grant a waiver of Order 2007-626 to avoid delaying the addition of new peaking generation.

2. The Company proposes modeling its replacement peaking generation in its 2021 Update to the Modified 2020 IRP. Petitioners have intervened and are actively participating in DESC’s ongoing 2020 Integrated Resource Planning (“IRP”) proceeding (Docket No. 2019-226-E).

3. CCL is a nonprofit corporation organized under the laws of the State of South Carolina whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in its communities by working with individuals, businesses, and government to ensure balanced solutions. CCL and its members support the development of energy policy that is in the public interest of South Carolinians. CCL has members in South Carolina who receive electricity service from DESC and will be impacted by the decisions made in this proceeding; DESC’s proposed Peaker Plan will shape the Company’s supply-side resource portfolio and affect the cost of electricity. The principal address of CCL is P.O. Box 1765, Charleston, South Carolina 29402.

4. SACE is a nonprofit organization whose mission is to promote responsible and equitable energy choices to ensure clean, safe and healthy communities throughout the Southeast. SACE and its members are interested in promoting greater reliance on clean energy resources to meet the South’s energy needs. Like CCL, SACE has members

in South Carolina who receive electricity service from DESC and will be impacted by the decisions made in this proceeding; DESC's proposed Peaker Plan will shape the Company's supply-side resource portfolio and affect the cost of electricity. SACE's principal address is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Georgia and North Carolina, and in-state staff in Florida and South Carolina.

5. Through their involvement in this proceeding, petitioners seek to promote the adoption of near term renewables and clean energy alternatives, as well as transparent and robust resource planning. Petitioners also seek to ensure that DESC is undertaking an EFA-compliant planning process in which it properly considers and accurately estimates the cost of alternative supply and demand resources before investing further in gas-fueled replacement generation. Participation in this proceeding is aimed at supporting clean energy decisions that will lead to cleaner, safer, and healthier communities for all South Carolinians.

6. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, the Petitioners are represented by counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 16th day of April, 2021.

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CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail or electronic mail with a copy of the *Petition to Intervene* of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

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